

DANIEL G. BOGDEN
United States Attorney
District of Nevada
MARK E. WOOLF
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Telephone: 702-388-6336
Facsimile: 702-388-6787
Email: mark.woolf@usdoj.gov

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LISA CHRISTIANSON,

Plaintiff,

v.

SALLY JEWEL, Secretary, DEPARTMENT
OF INTERIOR,

Defendant.

Case No: 2:16-cv-00188-JAD-VCF

**STIPULATION TO EXTEND TIME
TO FILE JOINT STATEMENT
REGARDING EARLY NEUTRAL
EVALUATION**

STIPULATION TO EXTEND TIME

(First Request)

Pursuant to Local Rule IA 6-1, Local Rule IA 6-2, and Local Rule 7-1, the parties hereby stipulate to a two-week extension of time to file a joint statement regarding whether it would be fruitful to conduct an early neutral evaluation in light of Defendant's motion to dismiss based on sovereign immunity, failure to exhaust administrative remedies, and failure to state a claim. *See* Order at ECF No. 10. The parties respectfully request this extension to allow Plaintiff and her counsel full opportunity to review and evaluate the issues raised in the motion to dismiss. Further, while it is Defendant's position that an ENE should not go forward while there is a jurisdictional question pending, counsel for the respective parties have engaged in good faith discussions regarding the possibility of resolving this matter short of continued litigation and without need of an early neutral evaluation. The parties continue to work constructively toward resolution and believe the additional time will permit for a more detailed

1 joint statement whereby the court can fully evaluate whether to exempt this case from the early neutral
2 evaluation process. With the extension, the joint statement will be due by May 23, 2016. This is the
3 first request for an extension of time to file a joint statement regarding early neutral evaluation.

4 WHEREFORE, the parties respectfully request that this stipulation be granted and the deadline
5 for the parties to file a joint statement regarding an early neutral evaluation be extended to May 23,
6 2016.

7 Respectfully submitted this 9th day of May 2016.

8 HUTCHISON & STEFFEN, LLC

9 /s/ Todd W. Prall

10 JOHN T. STEFFEN (4390)

11 TODD W. PRALL (9154)

Attorneys for the Plaintiff

DANIEL G. BOGDEN

United States Attorney

/s/ Mark E. Woolf

MARK E. WOOLF

Assistant United States Attorney

Attorneys for the United States

12
13 **IT IS SO ORDERED:**

14 
15 **NANCY J. KOPPE**
16 **UNITED STATES MAGISTRATE JUDGE**

17 **DATED:** May 10, 2016
18
19
20
21
22
23
24
25
26